

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

**In re: DAVID ROMAN,
Debtors**

: CHAPTER13

: BANKR. NO. 19-16860

DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS

The Debtor's Plan is feasible, as the payments are equal to the claims to be paid. There has been no delay in this case. The only matter at issue is fixing the correct amount of the mortgage balance, which the Debtor is paying off directly to the mortgagee, pursuant to the Debtor's plan. The Debtor could not file the necessary objection to the mortgagee's attempt to improperly "amend" a claim filed by the Debtor on its behalf until the amendment was filed, which did not occur until April 23, 2020, and the mortgagee committed itself to not filing a "governmental" claim, which did not occur until April 29, 2020.

WHEREFORE, the Motion should be denied or continued until after the Objection, which is presently scheduled for a hearing on June 9, 2020, is resolved.

Dated: May 2, 2020

Attorney for Debtors

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